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*Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

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Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION RE: THE PRODUCTION OF  
THE 2015 BUTTE FIRE SETTLEMENT  
INFORMATION**

[No Hearing Requested]

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 The parties, by and through the Tort Claimants Committee (the “TCC”) and Pacific Gas  
3 and Electric Company and PG&E Corporation (collectively, the “Debtors”), hereby reach the  
4 following stipulation as to the Debtors’ production of settlement information related to the 2015  
5 Butte Fire.

6 **STIPULATION**

7 The Debtors and the TCC agree to the Order re: the Production of the 2015 Butte Fire  
8 Settlement Information, filed concurrently with this stipulation. Specifically, the parties agree as  
9 follows:

10 1. The Debtors shall redact names, addresses and any other personally identifying  
11 information associated with individual claims from the Butte Settlement Documents prior to their  
12 production.

13 2. To the extent that any documents that the Debtors produce as part of the Butte  
14 Settlement Documents are subject to mediation confidentiality under Cal. Evid. C. § 1119, the  
15 Debtors’ production of such documents in these Chapter 11 Cases shall not constitute a violation  
16 of any provision governing mediation confidentiality, including Cal. Evid. C. §§ 1115-28.

17 3. To the extent that any documents that the Debtors produce as part of the Butte  
18 Settlement Documents are subject to work product protection or attorney-client privilege under  
19 state or federal law, the Debtors’ production of such documents in these Chapter 11 Cases shall  
20 not constitute a waiver of privilege or work product protection over any other document, or any  
21 kind of subject matter waiver. Nothing in this Order shall preclude the TCC from arguing that any  
22 work product protection, attorney-client privilege or other protection asserted by Debtors over the  
23 Butte Settlement Documents has already been waived by the Debtors. Further, nothing in this  
24 order precludes the Debtors from disagreeing with and opposing such argument..

25 4. This Court shall retain jurisdiction to hear and determine all matters arising from  
26 or related to the implementation, interpretation or enforcement of this Order.  
27  
28

1 So stipulated:

2 Dated: August 29, 2019

CRAVATH, SWAINE & MOORE LLP

3  
4 /s/ Kevin J. Orsini

5 KEVIN J. ORSINI  
6 Attorney for the Debtors

7  
8 Dated: August 29, 2019

BAKER & HOSTETLER LLP

9  
10 /s/ Kimberly S. Morris

11 KIMBERLY S. MORRIS  
12 Attorney for the Tort Claimants' Committee  
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